

1 I. NEEL CHATTERJEE (State Bar No. 173985)
nchatterjee@orrick.com
2 MONTE COOPER (State Bar No. 196746)
mcooper@orrick.com
3 ROBERT L. URIARTE (State Bar No. 258274)
ruriarte@orrick.com
4 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Rd.,
5 Menlo Park, California 94025
Telephone: 650-614-7400
6 Facsimile: 650-614-7401

7 FREDERICK D. HOLDEN, JR. (State Bar No. 61526)
fholden@orrick.com
8 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Rd.,
9 Menlo Park, California 94025
Telephone: 415-773-5958
10 Facsimile: 415-773-5759

11 Attorneys for Plaintiff
12 FACEBOOK, INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION
16

17 FACEBOOK, INC.,

18 Plaintiff,

19 v.

20 POWER VENTURES, INC. a Cayman Island
21 corporation, STEVE VACHANI, an individual;
DOE 1, d/b/a POWER.COM, DOES 2-25,
22 inclusive,

23 Defendants.
24
25
26
27
28

Case No. 5:08-cv-05780-LHK

**STIPULATION AND [PROPOSED]
ORDER, PURSUANT TO CIVIL
LOCAL RULE 7-12, TO FILE
PREVIOUSLY LODGED MATERIAL
AND UNSEAL PREVIOUSLY SEALED
MATERIALS**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Judge Lucy H. Koh

1 This Stipulation is entered into and between Plaintiff Facebook, Inc. ("Facebook"), and
 2 Defendants Power Ventures, Inc. and Steven Vachani ("Defendants"). It is hereby stipulated and
 3 agreed, pursuant to Civil Local Rule 7-12, that subject to approval of the Court:

4 1. The Expert Report of Bob Zeidman and Lawrence Melling, previously lodged with
 5 and considered by the Court, shall be formally filed so that it may be considered by the Ninth
 6 Circuit as part of the record on appeal.

7 2. For the convenience of the Ninth Circuit, the parties, and the public, certain
 8 materials previously sealed by this Court shall now be unsealed: Dkt. Nos. 213-2, 213-4, 217
 9 (main declaration only), 300-1, and 372, as well as the Expert Report of Bob Zeidman and
 10 Lawrence Melling (main report only).

11 Dated: May 28, 2014

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ I. Neel Chatterjee

I Neel Chatterjee
 Attorney for Plaintiff
 FACEBOOK, INC.

16 Dated: May 28, 2014

AROPLEX LAW

/s/ Amy Sommer Anderson

Amy Sommer Anderson
 Attorney for Defendant
 POWER VENTURES, INC.

21 Dated: May 28, 2014

/s/ Steven Vachani

Steven Vachani
 Pro Se Defendant

24 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of
 25 perjury that concurrence in the filing of the document has been obtained from its signatories.

26 Dated: May 28, 2014

/s/ I. Neel Chatterjee

I Neel Chatterjee

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2 DATED: _____

3 LUCY KOH
4 United States District Judge